

November 13, 2013

Commission's Secretary, Office of the Secretary
Federal Communications Commission
445 12th St. SW., Room TW-A325
Washington, DC 20554

Re: Comment on Empowering Consumers to Prevent and Detect Billing for Unauthorized Charges ("Cramming") CG Docket No. 11-116

I want to thank the Federal Communications Commission for its willingness to address the pervasive "cramming" problem. Seeing as this is a persistent problem where the Commission has noted voluntary industry practices have proved ineffective and there is concern that bill formatting and transparency are insufficient to deter the practice, implementation of an "opt-in" approach is in order.

Proposed "Opt-In" Structure:

Carriers should have a list of third parties consumers have opted into receiving charges from and block charges from other third parties. There should be different ways for consumers to opt into allowing particular third parties to submit charges to the carrier to accommodate the needs of different consumers:

Online options:

- To ease the process for consumers who pay their bills online, carriers should send an email to consumers notifying them that a particular third party is requesting to add charges. At that point, the consumer can log into her account and add the third party to her list of approved third parties she can receive charges from.
- Consumers should have the option of logging into their accounts and proactively adding third parties to their approved list at any time.

Telephone options:

- For consumers not paying their bills online, carriers should call consumers notifying them when a particular third party is requesting to add charges. The consumer can then tell the customer service representative whether or not she wishes to accept the charge and add the third party to her list of approved third parties.
- Consumers should have the option of calling a customer service representative to proactively add third parties to their approved list at any time.

Bill options:

- If a consumer has not been responsive to online or telephone requests, the next bill should not include the unapproved third-party charge. It should, however, include a prominent notice in an extra sheet of paper on top of the bill itself. The notice should explain that an unapproved third party is requesting to make a charge and give the option of paying the

charge by adding it to the overall bill payment if the consumer wishes to accept the charge. The bill total, however, should NOT include the charge. The consumer should also have the option of adding the third party to their approved list by signing a statement they can send the carrier with their payment.

Bill formatting:

- All charges should be clearly separated amongst the different parties making them, and there should be a phone number to call to contest the charges next to every one.
- Every bill should include a list of approved third parties, featured prominently, even if there is no charge on that particular bill from an approved third party.

Duration:

- To avoid fraudulent charges that could have slipped through the cracks from being charged indefinitely, there should be a one-year period for opting into charges from particular third parties.
- To renew their approval, carriers should go through the same processes outlined above.

Thank you for your consideration.

Sincerely,

Natalia Renta
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Class of 2015